

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

V.

Huawei Investment & Holding Co., Ltd.,
Huawei Technologies Co., Ltd.,
Huawei Technologies USA Inc.,
Huawei Device Co. Ltd. (f/k/a Huawei
Device (Dongguan) Co.),
Huawei Device (Shenzhen) Co., Ltd. (f/k/a
Huawei Device Co., Ltd.),
Huawei Device USA, Inc.

[illegible]

CIVIL ACTION NO. 6:20-cv-192

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos” or “Plaintiff”), by and through its attorneys, files this Complaint for Patent Infringement against Defendants Huawei Investment & Holding Co., Ltd., Huawei Technologies Co., Ltd., Huawei Technologies USA Inc., Huawei Device Co. Ltd. (f/k/a Huawei Device (Dongguan) Co.), Huawei Device (Shenzhen) Co., Ltd. (f/k/a Huawei Device Co., Ltd.), and Huawei Device USA, Inc. (collectively “Huawei” or “Defendants”) and alleges:

NATURE OF THE ACTION

1. This is a civil action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1, et seq., including §§ 271, 281, 284, and 285.

THE PARTIES

2. Brazos is a limited liability corporation organized and existing under the laws of Delaware, with its principal place of business at 605 Austin Ave, Ste 6, Waco, TX 76701.

3. On information and belief, Defendant Huawei Investment & Holding Co., Ltd. is a Chinese corporation that does business in Texas, directly or through intermediaries, with a principal place of business at Bantian, Longgang District, Shenzhen, 518129, People's Republic of China.

4. On information and belief, Defendant Huawei Technologies Co., Ltd. is a Chinese corporation that does business in Texas, directly or through intermediaries, with a principal place of business at Bantian, Longgang District, Shenzhen 518129, People's Republic of China.

5. Upon information and belief, Defendant Huawei Technologies USA Inc. is a corporation organized and existing under the laws of Texas that maintains an established place of business at 2391 NE Interstate 410 Loop, San Antonio, TX 78217. Huawei Technologies USA, Inc. is authorized to do business in Texas and may be served via its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

6. Upon information and belief, Defendant Huawei Device Co. Ltd. (formerly known as Huawei Device (Dongguan) Co.) is a Chinese corporation that does business in Texas, directly or through intermediaries, and maintains a principal place of business in No.2 of Xincheng Road, Songshan Lake Zone, Dongguan, Guangdong 523808, People's Republic of China.

7. Upon information and belief, Huawei Device (Shenzhen) Co., Ltd. (formerly known as Huawei Device Co., Ltd.) is a wholly-owned subsidiary of Defendant Huawei

Device Co. Ltd. is a Chinese corporation that does business in Texas, directly or through intermediaries, and maintains a principal place of business in Bantian, Longgang District, Shenzhen 518129, People's Republic of China.

8. On information and belief, Defendant Huawei Device USA, Inc., is a Texas corporation with a principal place of business located at 5700 Tennyson Parkway, Suite 600, Plano, Texas 75024. Huawei Device USA, Inc. is authorized to do business in Texas and may be served via its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

9. All of the Defendants operate under and identify with the trade name "Huawei." Each of the Defendants may be referred to individually as a "Huawei Defendant" and, collectively, Defendants may be referred to below as "Huawei" or as the "Huawei Defendants." Upon information and belief, Defendant Huawei Investment & Holding Co., Ltd. provides consolidated financial reporting for Huawei entities, including all Huawei Defendants.

JURISDICTION AND VENUE

10. This is an action for patent infringement which arises under the Patent Laws of the United States, in particular, 35 U.S.C. §§271, 281, 284, and 285.

11. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

12. This Court has specific and general personal jurisdiction over each Huawei Defendant pursuant to due process and/or the Texas Long Arm Statute, because each Huawei Defendant has committed acts giving rise to this action within Texas and within this judicial district. The Court's exercise of jurisdiction over each Huawei Defendant would not offend traditional notions of fair play and substantial justice because Huawei has established

minimum contacts with the forum. For example, on information and belief, Huawei Defendants have committed acts of infringement in this judicial district, by among other things, selling and offering for sale products that infringe the asserted patent, directly or through intermediaries, as alleged herein.

13. Venue in the Western District of Texas is proper pursuant to 28 U.S.C. §§1391(b), (c)(3), and 1400(b) because Huawei Technologies USA Inc. and Huawei Device USA Inc. have committed acts of infringement in this judicial district and have a regular and established places of business in this judicial district and in Texas. As non-limiting examples, on information and belief, Huawei Technologies USA Inc. and Huawei Device USA Inc. have sold or offered to sell the Accused Products in this judicial district and have employees or agents that operate Huawei equipment in this judicial district, including at 189 CR 265, Georgetown, TX 78626, 1150 S Bell Blvd, Cedar Park, TX 78613, 1399 S A W Grimes Blvd, Round Rock, TX 78664, 12335 IH 35, Jarrell, TX 76537, 1050 Rabbit Hill Rd, Unit #E, Georgetown, TX 78626, 1602 A W Grimes Blvd, Round Rock, TX 78664, 4120 IH 35 N, Georgetown, TX 78626, 900 CR 272, Leander, TX 78641, 1950 Crystal Falls Pkwy, Leander, TX 78641, 1101 N Industrial Blvd, Round Rock, TX 78681, 506 McNeil Rd, Round Rock, TX 78681, 3210 Chisholm Trail Rd, Round Rock, TX 78681, 112 Roundville Ln, Round Rock, TX 78664, 202 Central Dr W, Georgetown, TX 78628, 3595 E Hwy 29, Georgetown, TX 78626, 1402 W Welch St, Taylor, TX 76574, 3801 Oak Ridge Dr, Round Rock, TX 78681, 1957 Red Bud Ln #B, Round Rock, TX 78664, 6603 S Lakewood Dr, Georgetown, TX 78633, 500 W Front, Hutto, TX 78634.

COUNT ONE - INFRINGEMENT OF
U.S. PATENT NO. 7,515,546

14. Brazos re-alleges and incorporates by reference the preceding paragraphs of this Complaint.

15. On April 7, 2009, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,515,546 (“the ’546 Patent”), entitled “Method and apparatus for automatic discovery of network devices with data forwarding capabilities.” A true and correct copy of the ’546 Patent is attached as Exhibit A to this Complaint.

16. Brazos is the owner of all rights, title, and interest in and to the ’546 Patent, including the right to assert all causes of action arising under the ’546 Patent and the right to any remedies for the infringement of the ’546 Patent.

17. Huawei makes, uses, sells, offers for sale, imports, and/or distributes in the United States, including within this judicial district, products such as, but not limited to, management systems for enterprises that integrate convergent O&M management solution oriented to enterprise data centers, campus/branch networks, unified communications, videoconferencing, and video surveillance (collectively, the “Accused Products”).

18. The Accused Products include Huawei eSight.

19. Huawei eSight provides management of network devices (or, resources). Before eSight manages a network, the network devices connect and establish network connections with the eSight.

Adding Network Devices

The resource is a general term for all eSight managed objects (MOs). Before the eSight manages a network, you must connect resources to the eSight and establish network connections between the eSight and MOs. After that, the eSight can communicate with MOs to manage the network.

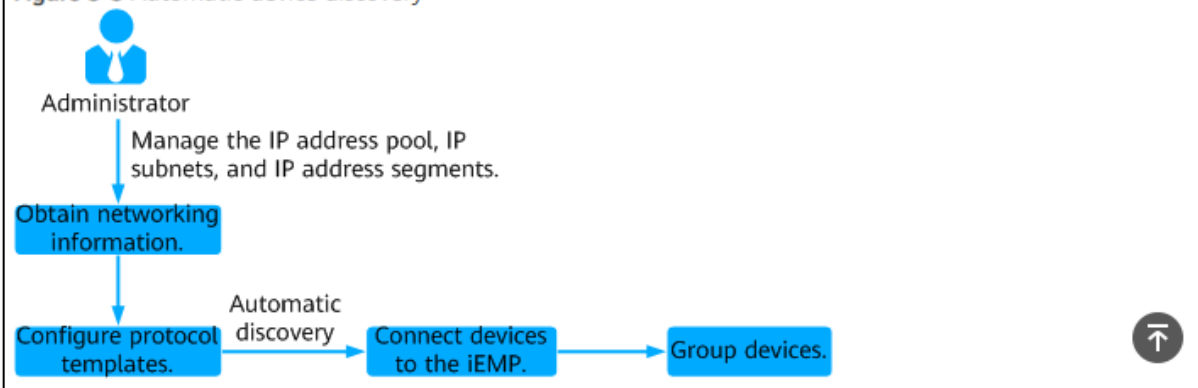
<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/a2b0eb1d/adding-network-devices>

20. eSight allows planning and creation of subnets before adding devices. A user can then add devices based on the subnets.

Principle

Resource management provides the automatic device discovery. When users have set the network segment and the task execution frequency, devices will be automatically discovered and added to the eSight as scheduled. Devices can be added one by one or in batches. Figure 3-6 shows the process of discovering devices.

Figure 3-3 Automatic device discovery



<https://support.huawei.com/enterprise/en/doc/EDOC1100107090/96810d25/principle>

Procedure

1. Creating a subnet.

You need to plan and create subnets before adding devices, and classify the devices to the subnets.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/709813a6/adding-resources>.

21. eSight provides three Subnet types for adding different types of resources such as network devices, IT storage devices. etc.

Subnet Type	Navigation Path	Device or Application
Default Subnet	a. Choose Resource > Common from the main menu. b. Choose Add Resource > Add Subnet in the navigation area on the left.	Network devices, IT storage devices, FC switches, hosts, computing devices, and collaboration management devices and applications. <div style="border: 1px solid #ccc; background-color: #f9f9f9; padding: 10px;"> NOTE: Of collaboration management devices and applications, do not manage IP phones, CC solution applications, UC solution applications and IVS solution applications in the default subnet. </div>
CC Subnet		This subnet consists of CC applications.
UC Subnet		This subnet consists of UC applications, including MAA, MeetingMS, AppAgent, BMU, UMServer, and eServer.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/709813a6/adding-resources>

22. After adding subnets, resources are discovered and added to the eSight. eSight uses Simple Network Management Protocol (SNMP) for discovering and adding resources (e.g. network devices). Using the SNMP protocol, eSight delivers commands containing SNMP parameters to devices. If the devices detect that the received SNMP parameters are the same as those on them, devices are successfully added to eSight.

Configuring the SNMP Protocol on Devices

The SNMP protocol is used to add devices to eSight. SNMP parameters on devices must be the same as those on eSight.

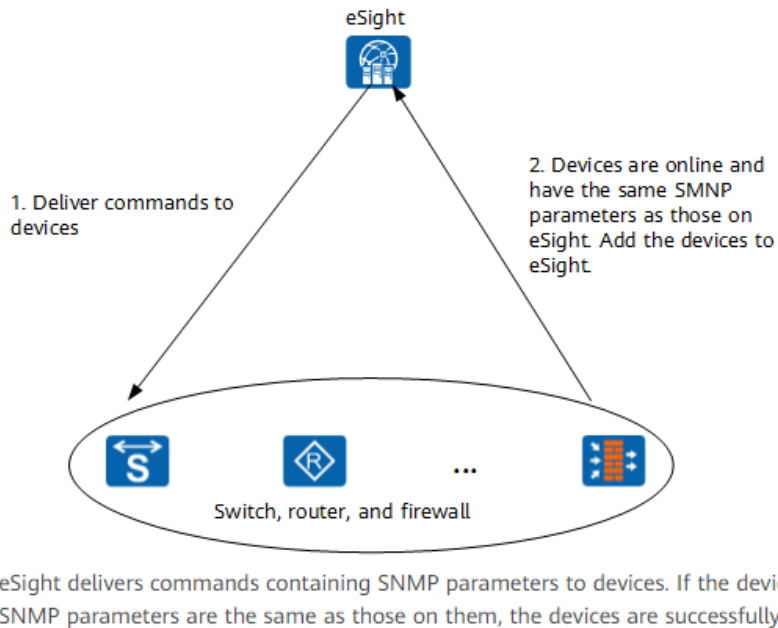
<https://support.huawei.com/enterprise/us/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

Principle

- Adding network devices

The principle for adding devices to eSight through SNMP is shown in **Figure 1 Principle for adding devices to eSight**.

Figure 3-41 Principle for adding devices to eSight



<https://support.huawei.com/enterprise/en/doc/EDOC1100107090/e5a1ada8/basic-management-of-network-devices>

23. eSight provides Automatic Discovery method to add resources. Using the Automatic discovery method, the devices within a specific IP segment are added to eSight for management.

3. Adding resources.

eSight provides automatic discovery, batch import, and single addition methods to add resources.

- Automatic discovery: Use this function to add devices within a specific IP segment to eSight in batches.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/709813a6/adding-resources>

Automatic discovery	Devices in one or more network segments are added at a time. This method applies when devices are distributed in one or multiple network segments and devices in the same network segment have the same SNMP parameter settings.
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<https://support.huawei.com/enterprise/en/doc/EDOC1100107090/e5a1ada8/basic-management-of-network-devices>

24. An administrator selects Automatic Discovery from Add Resource option on the left tree in eSight. The admin needs to enter Start IP address and End IP address in basic settings to provide a range of IP addresses for automatic discovery of devices in a network segment. The eSight discovers resources (e.g. network devices) between the defined IP addresses starting from Start IP address (or the first network address).

a. Choose **Resource > Common > Add Resource > Automatic Discovery** from the main menu.

The screenshot shows the eSight web interface. The top navigation bar includes 'Home', 'Resource', 'Topology', 'Fault', 'Performance', 'Report', and 'Big Screen Monitor'. The left sidebar shows a tree structure with 'Common' selected. The main content area is titled 'Add Resource' and shows 'Automatic Discovery' settings. Under 'Basic Settings', there are three rows of IP address ranges. Each row has a 'Start IP address' and an 'End IP address' field. The first row shows '10.137.59.1' and '10.137.59.254'. The second row shows '10.137.61.1' and '10.137.61.254'. The third row shows '10.137.241.1' and '10.137.241.254'. Below these fields is a '+ Add' button. Further down, there are sections for 'Task Settings' and 'SNMP Settings'. The 'Automatically add discovered devices' checkbox is checked. At the bottom, there is a 'Discover' button.

<https://support.huawei.com/enterprise/en/doc/EDOC1100044378/a5d479fa/adding-network-devices>.

Basic Settings

* Start IP address: 10.139.59.0 * End IP address: 10.137.59.240 * Add to subnet: Root/01A... X

+ Add

Task Settings

SNMP Settings

Select a protocol template based on the protocol type of a device to set up communication with that device. The security level of SNMP V3 is higher than that of SNMP V1 and SNMPv2c.

Select SNMP Protocol Template ☐ Automatically match template

Priority	Template Name	Protocol Version	Timeout Period (s)	Retries	Operation
1	DefaultSNMPv2c	SNMPv2c	4	3	↑ ↓ X

☒ Automatically add discovered devices

Discover

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>.

25. Huawei describes its SNMP management model as containing four components: Network management system (NMS), agent, management object, and Management Information Base (MIB).

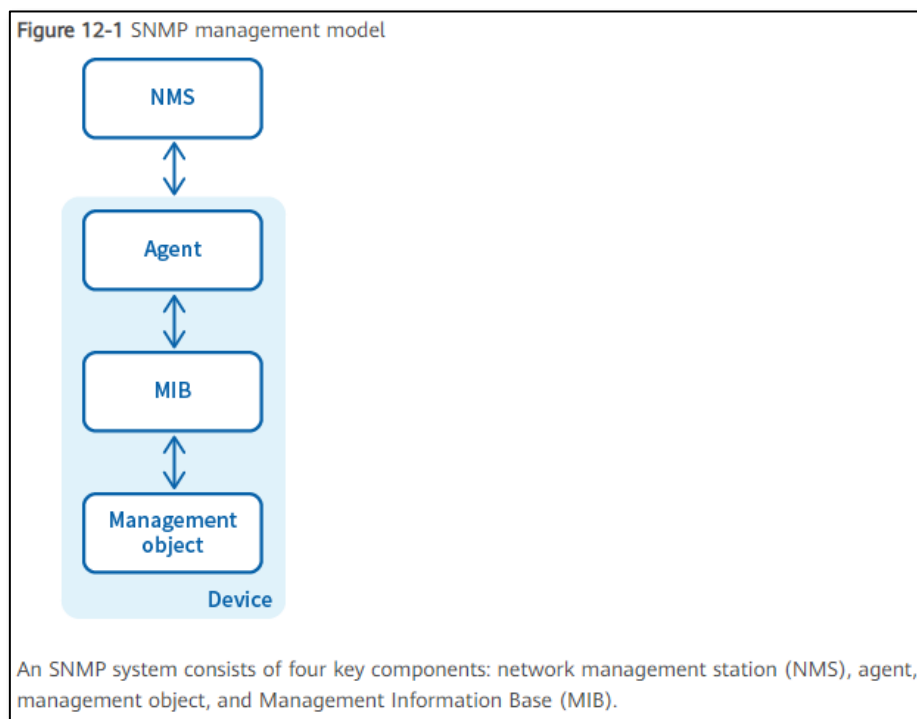


Fig. 1

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>

26. The management devices contain an agent process, MIB, and multiple management objects. The NMS interacts with the agent on a device, which performs an operation on the MIB after receiving commands from the NMS.

Each managed device contains an agent process, MIB, and multiple management objects. The NMS interacts with the agent on a managed device. When receiving a command from the NMS, the agent performs operations on the MIB in the managed device.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>

27. The NMS manager runs on NMS servers in a network to monitor and control network devices using SNMP. The agent is a process running on a managed device. The agent maintains data on the managed device, responds to request packets from the NMS, and returns management data to the NMS. MIB is a database containing the variables that are maintained by the managed device and can be queried or set by the agent. A management object is an object to be managed on a network device.

NMS	<p>The NMS is a manager on a network. It monitors and controls network devices using SNMP. The NMS software runs on NMS servers to implement the following functions:</p> <ul style="list-style-type: none"> • Sends requests to agents on managed devices to query or modify variables. • Receive traps sent from agents on managed devices to learn device status.
Agent	<p>The agent is a process running on a managed device. The agent maintains data on the managed device, responds to request packets from the NMS, and returns management data to the NMS.</p> <ul style="list-style-type: none"> • Upon receiving a request packet from the NMS, the agent performs the required operation on the MIB and sends the operation result to the NMS. • When a fault or an event occurs on the managed device, the agent sends a notification containing the current device status to the NMS.
MIB	<p>MIB is a database containing the variables that are maintained by the managed device and can be queried or set by the agent. MIB defines the attributes of the managed device, including the name, status, access rights, and data type of management objects.</p> <p>MIB provides the following functions:</p> <ul style="list-style-type: none"> • The agent queries the MIB to obtain the current device status. • The agent modifies the MIB to set device status parameters.
Management object	<p>A management object is an object to be managed on a network device. A managed device contains multiple management objects, for example, a hardware component (such as an interface board) and parameters configured for the hardware or software (such as a route selection protocol).</p>

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>

28. eSight provides three versions of SNMP to use on the NMS for communication with the device. The SNMP versions on different application scenario e.g. network size, security, etc.

SNMP Application Environment

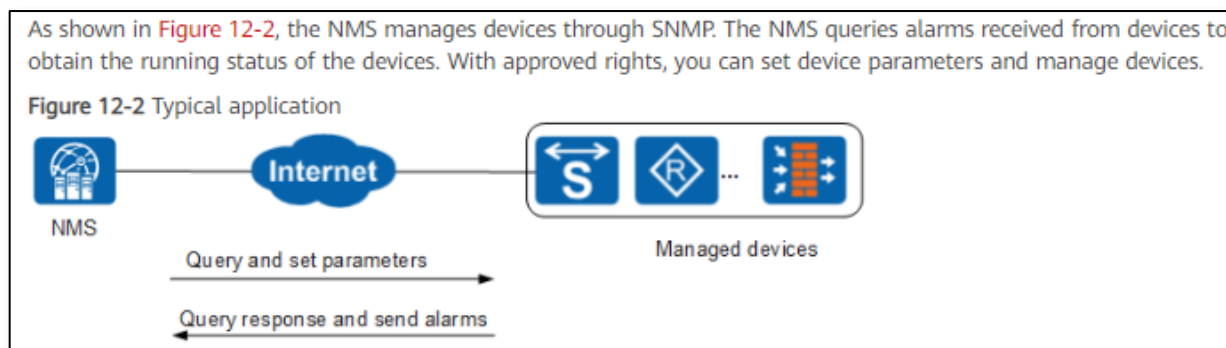
When you plan and construct a new network, you are advised to select the SNMP version based on the application scenario. When you expand or upgrade an existing network, you are advised to configure the SNMP version on the device based on the version used on the NMS to ensure communication between the device and eSight.

Table 12-1 Application scenario of each SNMP version

Version	Application Scenario
SNMPv1	Applies to small-sized simple networks where security requirements are not high or the network environment is safe and stable, such as campus networks and small-sized enterprise networks.
SNMPv2c	Applies to medium- to large-sized networks where security requirements are not high or the network environment is safe (such as VPNs), but a large volume of traffic exists and traffic congestion may occur.
(Recommended) SNMPv3	Applies to networks of various scales, especially those where security requirements are high and only authorized administrators can manage network devices, such as networks where communication data between the network management system (NMS) and managed devices is transmitted over the Internet.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>

29. The NMS manages devices through SNMP. The NMS sends queries to devices to obtain information in the response.



<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>

30. An SNMP packet includes IP address as header and other fields such as version, community name, and SNMP PDU. The SNMP PDU includes PDUs such as GetRequest PDU, GetNextRequest PDU, etc.

SNMPv1/SNMPv2c Packet Format

As shown in **Figure 2-3**, an SNMPv1/SNMPv2c packet is composed of the version, community name, and SNMP Protocol Data Unit (PDU) fields.

Figure 2-3 SNMPv1/SNMPv2c packet format

IP header	UDP header	Version	Community name	SNMP PDU
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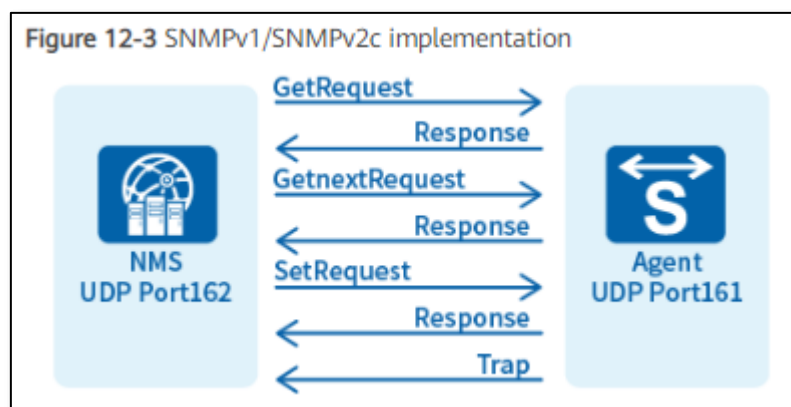
The following describe the fields in an SNMPv1/SNMPv2c packet:

- Version: specifies the SNMP version. The value for SNMPv1 is 0 and for SNMPv2c is 1.
- Community name: used in the authentication between agents and NMSs. The community name is a character string and can be defined by users. There are two types of community names: read and write.
 - Read community names are used for the GetRequest and GetNextRequest operations.
 - Write community names are used for the Set operation.
- SNMPv1/SNMPv2c PDU: includes the PDU type, request ID, and binding variable list.
 - The SNMPv1 PDU includes GetRequest PDU, GetNextRequest PDU, SetRequest PDU, Response PDU, and Trap PDU.
 - The SNMPv2c PDU inherits the SNMPv1 PDU and introduces the GetBulkRequest PDU and InformRequest PDU.

For simplification, the SNMP operations are described as the Get, GetNext, Set, Response, Trap, GetBulk, and Inform operations.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>

31. SNMPv1/SNMPv2c defines seven types of operations for exchanging information between the NMS and the agent. SNMPv3 provides a similar mechanism for request and response.



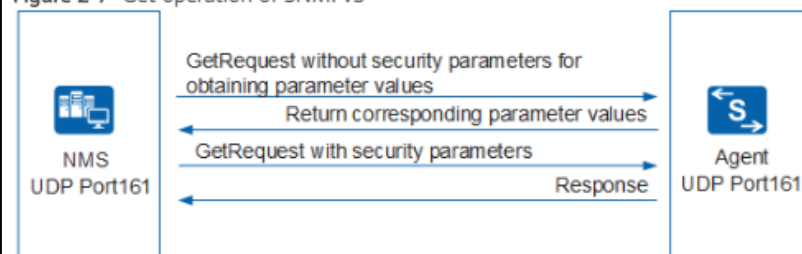
<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>.

SNMPv3 Mechanism

SNMPv3 has a similar mechanism to SNMPv1 and SNMPv2c. The only difference is that SNMPv3 supports identity authentication and encryption. The following uses the Get operation as an example to describe the SNMPv3 mechanism.

As shown in Figure 2-7, an NMS intends to obtain the value of the sysContact object on a managed device in authentication and encryption mode.

Figure 2-7 Get operation of SNMPv3



<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/703951c4/snmpv3>.

32. The NMS sends GetRequest (or Get) request to the device associated with the address (or, first address) to obtain values of specific variables from the SNMP agent in the device. In this manner, the eSight sends a GetRequest (or, first message) using NMS to a network device's network address to request information.

Operation	Description
Get	The management process reads one or several parameter values from the MIB of the agent process.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>.

- Get

In this example, the NMS intends to use the read community name **public** to obtain the value of the sysContact object on a managed device. The procedure is as follows:

- a. The NMS sends a GetRequest packet to the agent. The fields in the packet are as follows:
 - Version: SNMP version that the NMS is using
 - Community name: **public**
 - PDU type: Get
 - MIB object: sysContact
- b. The agent authenticates the SNMP version and community name in the packet. When authentication is successful, the agent encapsulates the sysContact value into the PDU of a response packet and sends the response packet to the NMS. If the agent fails to obtain the sysContact value, the agent returns an error message to the NMS.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>.

33. The admin configures SNMP parameters settings (e.g. SNMP Protocol template) during Automatic Discovery of resources. SNMP protocol settings provides a “timeout period” and number of “retries”. The NMS waits for the response as per the defined SNMP protocol settings (e.g. timeout period).

Basic Settings

* Start IP address: 10.139.59.0 * End IP address: 10.137.59.240 * Add to subnet: Root/01A... X

+ Add

Task Settings

SNMP Settings

Select a protocol template based on the protocol type of a device to set up communication with that device. The security level of SNMP V3 is higher than that of SNMP V1 and SNMPv2c.

Select SNMP Protocol Template ☐ Automatically match template

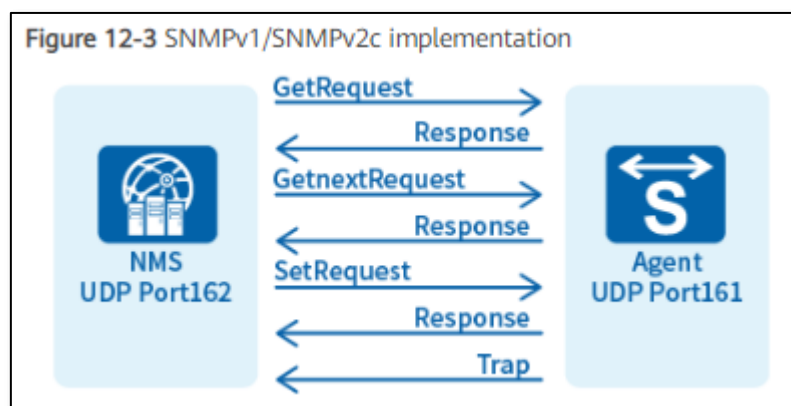
Priority	Template Name	Protocol Version	Timeout Period (s)	Retries	Operation
1	DefaultSNMPV2c	SNMPv2c	4	3	↑ ↓ X

☒ Automatically add discovered devices

Discover

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>.

34. The eSight NMS sends a GetRequest/Get (or, first message) to obtain information (e.g. syscontact object value) from agent on a network device. The NMS waits for the appropriate response from the SNMP agent in the device. The agent on a managed device sends a response packet only after authenticating the SNMP request.



<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>.

- Get

In this example, the NMS intends to use the read community name **public** to obtain the value of the sysContact object on a managed device. The procedure is as follows:

- a. The NMS sends a GetRequest packet to the agent. The fields in the packet are as follows:
 - Version: SNMP version that the NMS is using
 - Community name: **public**
 - PDU type: Get
 - MIB object: sysContact
- b. The agent authenticates the SNMP version and community name in the packet. When authentication is successful, the agent encapsulates the sysContact value into the PDU of a response packet and sends the response packet to the NMS. If the agent fails to obtain the sysContact value, the agent returns an error message to the NMS.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>

35. The admin configures SNMP parameters settings (e.g. SNMP Protocol template) during Automatic Discovery of resources. SNMP protocol settings provides a “timeout period” and number of “retries”. The NMS waits for the response as per the defined SNMP protocol settings (e.g. timeout period).

Basic Settings

* Start IP address: 10.139.59.0 * End IP address: 10.137.59.240 * Add to subnet: Root/01A... ✕

+ Add

Task Settings

SNMP Settings

❗ Select a protocol template based on the protocol type of a device to set up communication with that device. The security level of SNMP V3 is higher than that of SNMP V1 and SNMPv2c.

Select SNMP Protocol Template ☐ Automatically match template

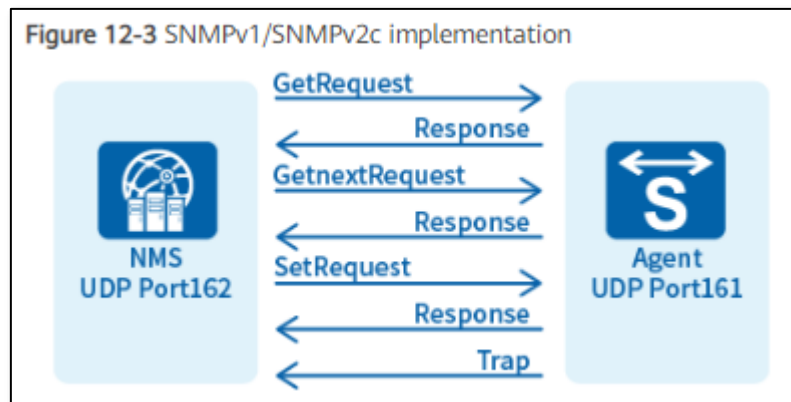
Priority	Template Name	Protocol Version	Timeout Period (s)	Retries	Operation
1	DefaultSNMPV2c	SNMPv2c	4	3	↑ ↓ ✕

☒ Automatically add discovered devices

Discover

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

36. The eSight NMS sends a GetRequest/Get (or, first message) to obtain information (e.g. syscontact object value) from agent on a network device. The NMS waits for the appropriate response from the SNMP agent in the device. The agent on a managed device sends a response packet only after authenticating the SNMP request.



<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles.>

- Get

In this example, the NMS intends to use the read community name **public** to obtain the value of the sysContact object on a managed device. The procedure is as follows:

- The NMS sends a GetRequest packet to the agent. The fields in the packet are as follows:
 - Version: SNMP version that the NMS is using
 - Community name: **public**
 - PDU type: Get
 - MIB object: sysContact
- The agent authenticates the SNMP version and community name in the packet. When authentication is successful, the agent encapsulates the sysContact value into the PDU of a response packet and sends the response packet to the NMS. If the agent fails to obtain the sysContact value, the agent returns an error message to the NMS.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>

37. The NMS receives response from the network device agent based on the GetRequest query. The agent queries the information required in response from the MIB. The MIB on a device defines the attributes of the managed device, including the name, status, access rights, and data type of management objects. An agent can use the MIB to learn information about a network device.

Response	Returns one or several variables. The agent performs this operation in response to the GetRequest, GetNextRequest, SetRequest, and GetBulkRequest operations. Upon receiving a Get or Set request from the NMS, the agent queries or modifies the variables in the MIB, and returns variables to the NMS.
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[https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c,](https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c)

- **MIB**

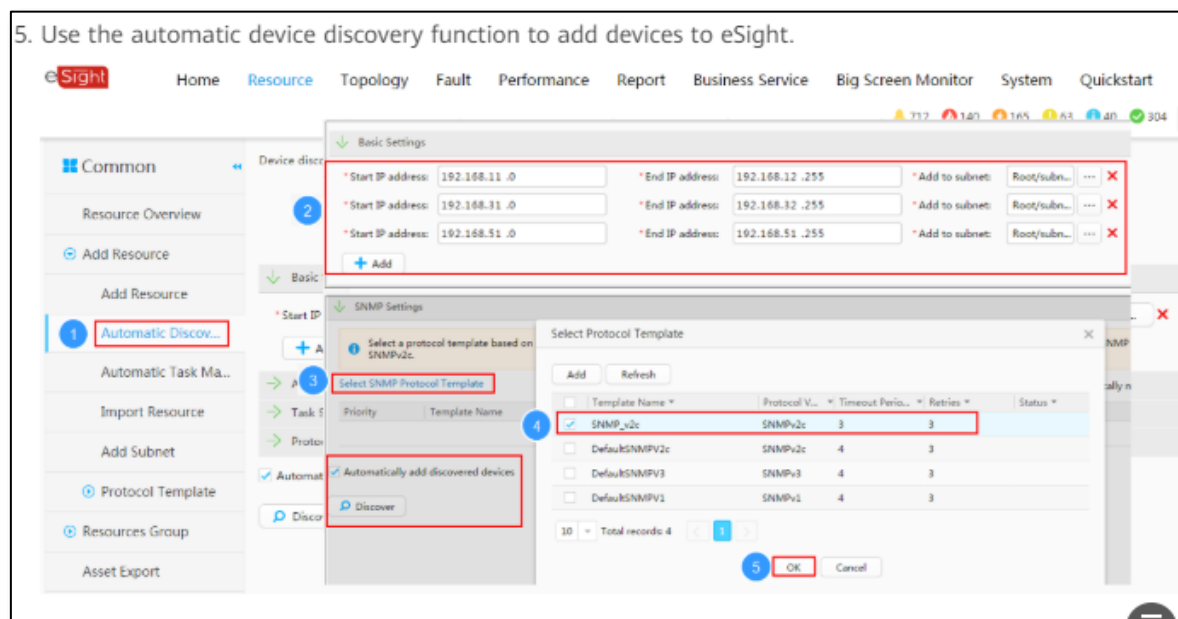
A MIB contains the variables that the managed device maintains and can be queried or set by the agent. MIB defines the attributes of the managed device, including the name, status, access rights, and data type of management objects.

An agent can use the MIB to:

- Learn the device status.
- Set the device status.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/9e3730e8/snmp-management-model>

38. The eSight NMS discovers resources (e.g. network devices) within different subnets during the automatic discovery. Automatic Discovery method provides an option to “Automatically add discovered devices.



<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/e4b41c07/typical-configuration-example>

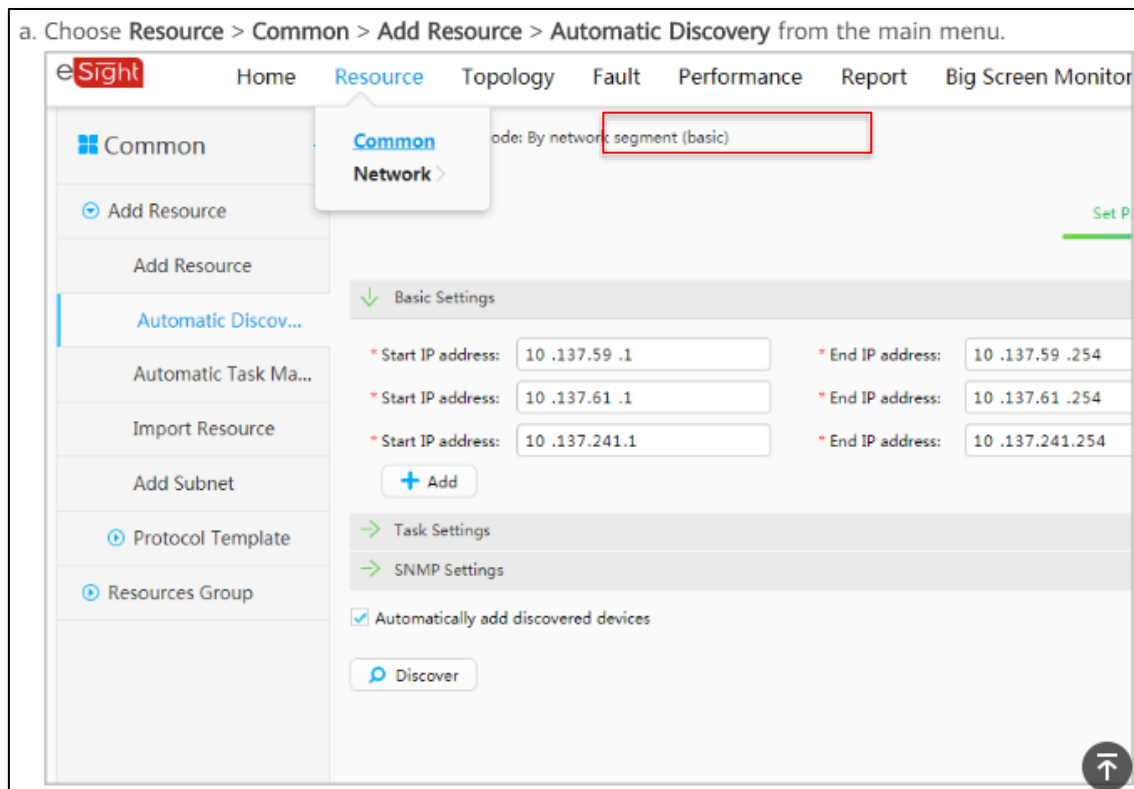
39. eSight provides user-defined auto-discovery methods such as simple mode and advanced mode. This allows administrator to discover specific device types. In simple mode,

only certain types of devices (such as routing devices) are discovered and added. These devices include network devices such as routers, switches, etc.

Auto Discovery Mode	Application Scenario
Simple mode	Use the simple mode when only the following device types need to be discovered: a. Network devices: such as routers, switches, AR routers, and firewalls. b. Telepresence devices in the UC&C field: such as endpoints (TE, VCT, and DP300) and MCUs.

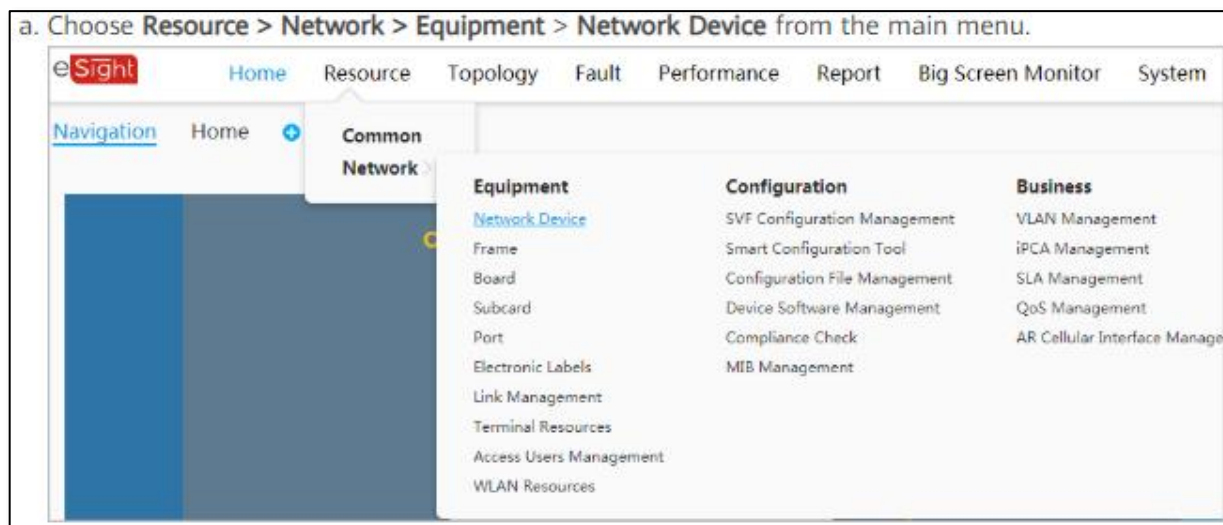
<https://support.huawei.com/enterprise/en/doc/EDOC1000020356?section=j00b>

40. The administrator can select basic mode (or, simple mode) to add devices such as routers, switches, etc. with routing capabilities.



<https://support.huawei.com/enterprise/en/doc/EDOC1100044378/a5d479fa/adding-network-devices>

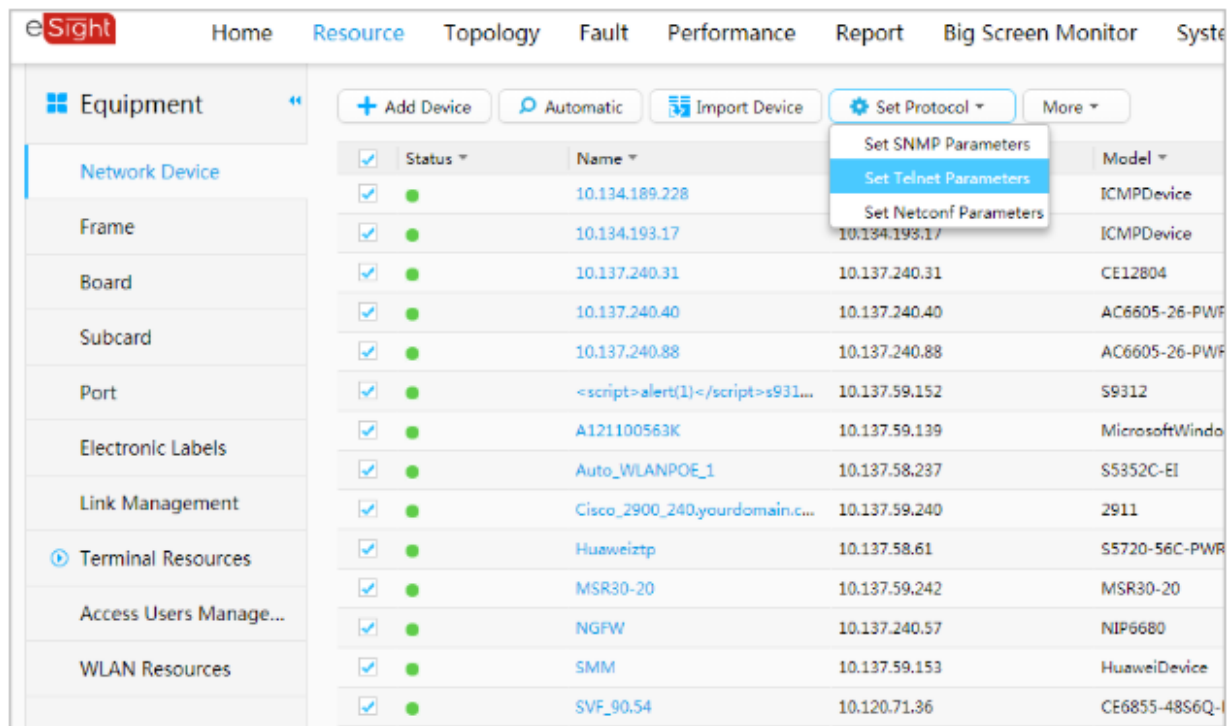
41. Therefore, the discovered network devices based on user defined auto-discovery mode are added to eSight automatically after the completion of discovery process. The added devices are shown in Resources tab. For example, the Network Devices added can be accessed using Resources > Network Devices. The Network Devices menu shows the details (e.g. IP address, name, model) of devices. Such details (e.g. model number) provides information about the routing capabilities of the devices.



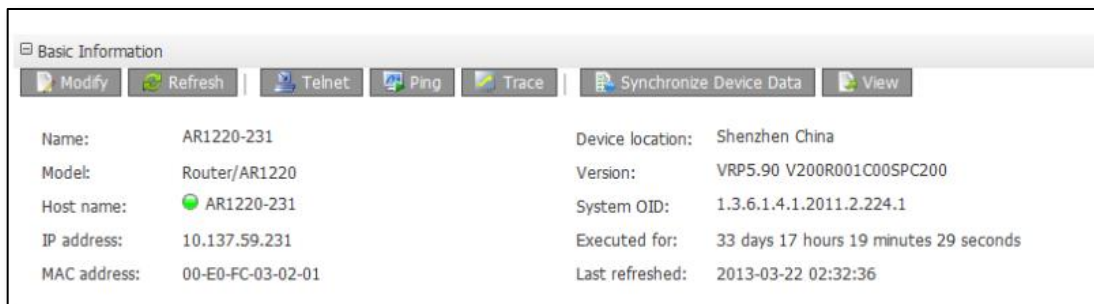
<https://support.huawei.com/enterprise/en/doc/EDOC1100011877/f09f8a66/operation-procedure>

Task	Operation Entry
View alarm information.	In the navigation tree on the left, choose View > Alarm List .
Modify Telnet parameters.	In the navigation tree on the left, choose Protocol Parameters > Telnet Parameters .
Modify SNMP parameters.	In the navigation tree on the left, choose Protocol Parameters > SNMP Parameters .
Synchronize device data.	In the navigation tree on the left, choose View > Basic Information and click Synchronization on the right.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>



<https://support.huawei.com/enterprise/en/doc/EDOC1100011877/f09f8a66/operation-procedure>



<https://support.huawei.com/enterprise/en/doc/EDOC1000020356?section=j006>

42. eSight detects network devices with routing capabilities (e.g. routers, switches, etc.) through simple automatic discovery mode.

Auto Discovery Mode	Application Scenario
Simple mode	Use the simple mode when only the following device types need to be discovered: <ul style="list-style-type: none"> a. Network devices: such as routers, switches, AR routers, and firewalls. b. Telepresence devices in the UC&C field: such as endpoints (TE, VCT, and DP300) and MCUs.

<https://support.huawei.com/enterprise/en/doc/EDOC1000020356?section=j00b>

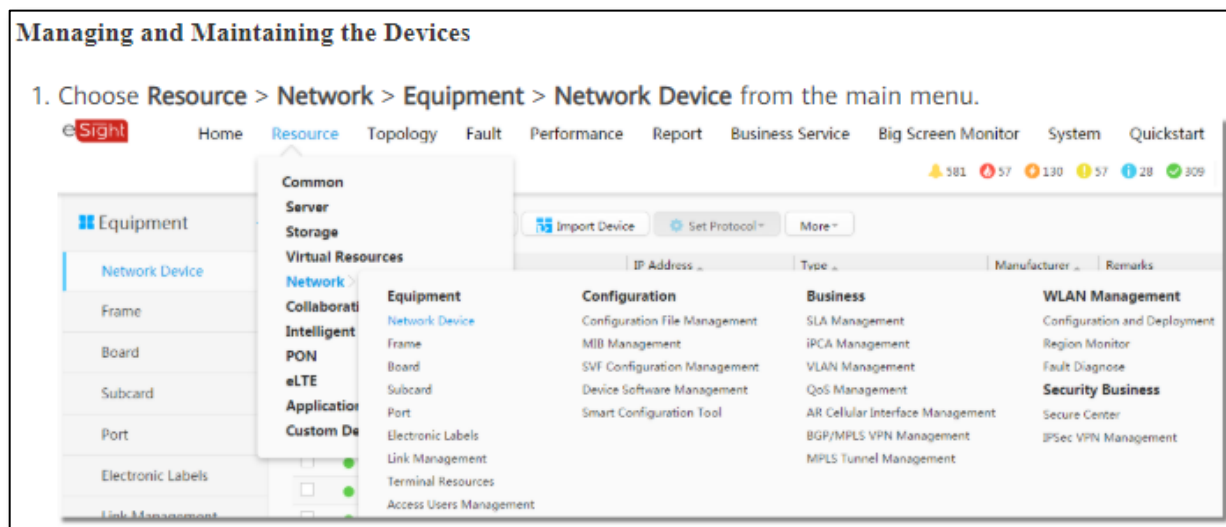
a. Choose **Resource > Common > Add Resource > Automatic Discovery** from the main menu.

The screenshot shows the eSight web interface. The top navigation bar includes 'Home', 'Resource', 'Topology', 'Fault', 'Performance', 'Report', and 'Big Screen Monitor'. The left sidebar shows 'Common' expanded, with 'Add Resource' selected. The main content area is titled 'Automatic Discovery' and includes a 'Basic Settings' section with three rows of IP address ranges (10.137.59.1-254, 10.137.61.1-254, and 10.137.241.1-254). Below this are 'Task Settings' and 'SNMP Settings' sections, and a checkbox for 'Automatically add discovered devices' which is checked. A 'Discover' button is at the bottom.

<https://support.huawei.com/enterprise/en/doc/EDOC1100044378/a5d479fa/adding-network-devices>

43. The discovered network devices (e.g. devices with routing capabilities such as routers, switches, etc.) are added to eSight network management system. The administrator

can view devices information of the added devices and perform required operations for management.



<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

2. Click name of the device to be managed and maintained, view device information and perform operations as required.

Task	Operation Entry
View alarm information.	In the navigation tree on the left, choose View > Alarm List .
Modify Telnet parameters.	In the navigation tree on the left, choose Protocol Parameters > Telnet Parameters .
Modify SNMP parameters.	In the navigation tree on the left, choose Protocol Parameters > SNMP Parameters .
Synchronize device data.	In the navigation tree on the left, choose View > Basic Information and click Synchronization on the right.

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

Basic Information	
Name:	AR1220-231
Model:	Router/AR1220
Host name:	AR1220-231
IP address:	10.137.59.231
MAC address:	00-E0-FC-03-02-01
Device location:	Shenzhen China
Version:	VRP5.90 V200R001C00SPC200
System OID:	1.3.6.1.4.1.2011.2.224.1
Executed for:	33 days 17 hours 19 minutes 29 seconds
Last refreshed:	2013-03-22 02:32:36

File <https://support.huawei.com/enterprise/en/doc/EDOC1000020356?section=j006>

44. The eSight network management system selects the provided addresses one by one and then sends requests to each address for discovering devices. Once the first address is analyzed and matched with the discovery criteria placed by the user through SNMP protocol, the network management system selects the second address in the specified range.

45. The second address is selected from the IP range (Start IP address and End IP address) specified in the discovery profile. The execution of the discovery starts with the first address in the specified range and is followed by subsequent addresses.

Basic Settings	
* Start IP address:	10.139.59.0
* End IP address:	10.137.59.240
* Add to subnet:	Root/01A... <input type="button" value="X"/>
<input type="button" value="+ Add"/>	
Task Settings	
SNMP Settings	
<p>Select a protocol template based on the protocol type of a device to set up communication with that device. The security level of SNMP V3 is higher than that of SNMP V1 and SNMPv2c.</p>	
<p>Select SNMP Protocol Template <input type="checkbox"/> Automatically match template</p>	
Priority	Template Name
1	DefaultSNMPV2c
Protocol Version	Timeout Period (s)
SNMPv2c	4
Retries	Operation
3	<input type="button" value="↑"/> <input type="button" value="↓"/> <input type="button" value="X"/>
<input checked="" type="checkbox"/> Automatically add discovered devices	
<input type="button" value="Discover"/>	

<https://support.huawei.com/enterprise/en/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

46. Once the second address is selected, the request is placed to obtain desired information from the SNMP agent at the network device. The response from the agent is analyzed and the discovered devices are added to eSight. The NMS uses GetRequest queries for each address and receives response from agents. This process gets repeated for all the addresses present in the range specified by the user.

- Get

In this example, the NMS intends to use the read community name **public** to obtain the value of the sysContact object on a managed device. The procedure is as follows:

- a. The NMS sends a GetRequest packet to the agent. The fields in the packet are as follows:
 - Version: SNMP version that the NMS is using
 - Community name: **public**
 - PDU type: Get
 - MIB object: sysContact
- b. The agent authenticates the SNMP version and community name in the packet. When authentication is successful, the agent encapsulates the sysContact value into the PDU of a response packet and sends the response packet to the NMS. If the agent fails to obtain the sysContact value, the agent returns an error message to the NMS.

<https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>

The screenshot shows the eSight interface with a sidebar on the left containing navigation options: Equipment, Network Device, Frame, Board, Subcard, Port, Electronic Labels, Link Management, Terminal Resources, Access Users Manage..., and WLAN Resources. The main area displays a table of network devices with columns for Status, Name, and Model. A dropdown menu is open over the table, showing options: Set SNMP Parameters, Set Telnet Parameters, and Set Netconf Parameters. The table lists various devices including ICMPDevice, CE12804, AC6605-26-PWF, S9312, MicrosoftWindows, S5352C-EI, 2911, S5720-56C-PWF, MSR30-20, NIP6680, HuaweiDevice, and CE6855-48S6Q-I.

Status	Name	Model
✓	10.134.189.228	ICMPDevice
✓	10.134.193.17	ICMPDevice
✓	10.137.240.31	CE12804
✓	10.137.240.40	AC6605-26-PWF
✓	10.137.240.88	AC6605-26-PWF
✓	<script>alert(1)</script>s931...	S9312
✓	A121100563K	MicrosoftWindows
✓	Auto_WLANPOE_1	S5352C-EI
✓	Cisco_2900_240.yourdomain.c...	2911
✓	Huawei1ztp	S5720-56C-PWF
✓	MSR30-20	MSR30-20
✓	NGFW	NIP6680
✓	SMM	HuaweiDevice
✓	SVF_90.54	CE6855-48S6Q-I

<https://support.huawei.com/enterprise/en/doc/EDOC1100011877/f09f8a66/operation-procedure>

47. In view of preceding paragraphs, each and every element of at least claim 1 of the '546 Patent is found in the Accused Products.

48. Huawei has and continues to directly infringe at least one claim of the '546 Patent, literally or under the doctrine of equivalents, by making, using, selling, offering for sale, importing, and/or distributing the Accused Products in the United States, including within this judicial district, without the authority of Brazos.

49. Huawei has received notice and actual or constructive knowledge of the '546 Patent since at least the date of service of this Complaint.

50. Since at least the date of service of this Complaint, through its actions, Huawei has actively induced product makers, distributors, retailers, and/or end users of the Accused Products to infringe the '546 Patent throughout the United States, including within this judicial district, by, among other things, advertising and promoting the use of the Accused Products in various websites, including providing and disseminating product descriptions, operating manuals, and other instructions on how to implement and configure the Accused Products. Examples of such advertising, promoting, and/or instructing include the documents at:

- <https://support.huawei.com/enterprise/us/doc/EDOC1100107090/16cdb2/logical-architecture>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100107090/4380cd56/network-management>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100107090/e5a1ada8/basic-management-of-network-devices>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100107090/e6ebf9aa/benefits>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/a2b0eb1d/adding-network-devices>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/4cbe8a31/overview>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/28c4e2a3/function>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100107090/96810d25/principle>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/709813a6/adding-resources>
- <https://support.huawei.com/enterprise/us/doc/EDOC1100097758/7dbd4dbd/operation-procedure>

- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/93b32c91/principles>
- <https://support.huawei.com/enterprise/en/doc/EDOC1000178174/73e6152/snmpv1-snmpv2c>
- <https://support.huawei.com/enterprise/en/doc/EDOC1000178174/703951c4/snmpv3>
- <https://support.huawei.com/enterprise/en/doc/EDOC1000178174/9e3730e8/snmp-management-model>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100097758/e4b41c07/typical-configuration-example>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100011877/f09f8a66/operation-procedure>
- <https://e.huawei.com/us/solutions/business-needs/enterprise-network/campus-network/agile-campus/wired-and-wireless-convergence>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100107090/c170f368/overview>
- <https://support.huawei.com/enterprise/en/doc/EDOC1000020356?section=j006>
- <https://support.huawei.com/enterprise/en/doc/EDOC1100044378/a5d479fa/adding-network-devices>

51. Since at least the date of service of this Complaint, through its actions, Huawei has contributed to the infringement of the '546 Patent by having others sell, offer for sale, or use the Accused Products throughout the United States, including within this judicial district, with knowledge that the Accused Products infringe the '546 Patent. The Accused Products are especially made or adapted for infringing the '546 Patent and have no substantial non-infringing use. For example, in view of the preceding paragraphs, the Accused Products contain functionality which is material to at least one claim of the '546 Patent.

JURY DEMAND

Brazos hereby demands a jury on all issues so triable.

REQUEST FOR RELIEF

WHEREFORE, Brazos respectfully requests that the Court:

(A) Enter judgment that Huawei infringes one or more claims of the '546 Patent literally and/or under the doctrine of equivalents;

(B) Enter judgment that Huawei has induced infringement and continues to induce infringement of one or more claims of the '546 Patent;

(C) Enter judgment that Huawei has contributed to and continues to contribute to the infringement of one or more claims of the '546 Patent;

(D) Award Brazos damages, to be paid by Huawei in an amount adequate to compensate Brazos for such damages, together with pre-judgment and post-judgment interest for the infringement by Huawei of the '546 Patent through the date such judgment is entered in accordance with 35 U.S.C. §284, and increase such award by up to three times the amount found or assessed in accordance with 35 U.S.C. §284;

(E) Declare this case exceptional pursuant to 35 U.S.C. §285; and

(F) Award Brazos its costs, disbursements, attorneys' fees, and such further and additional relief as is deemed appropriate by this Court.

Dated: March 16, 2020

Respectfully submitted,

/s/ James L. Etheridge

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